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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11 IN RE: CATHODE RAY TUBE (CRT)
12 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

13 This Document Relates to:

14 *ALL DIRECT PURCHASER ACTIONS*

15 *ALL INDIRECT PURCHASER ACTIONS*
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**STIPULATION AND ~~PROPOSED~~ ORDER
RE: IRICO DEPOSITIONS**

Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) and Defendants
 2 Irico Group Corporation and Irico Display Devices Co., Ltd. (“Irico” or the “Irico Defendants,”
 3 collectively the “Parties”), by and through the undersigned counsel and pursuant to Federal Rule of
 4 Civil Procedure 16(b)(4) and Civil Local Rule 7-12, hereby stipulate as follows:

5 WHEREAS, on August 11, 2022, the Court ordered that Irico witnesses must appear for
 6 deposition by September 9, 2022 (“September 9 Deadline”) [ECF No. 6047];

7 WHEREAS, following the Court’s order, Irico witnesses Wang Zhaojie and Yan Yunlong
 8 (the “Witnesses”) agreed to travel to Macau for depositions;

9 WHEREAS, Irico represents that the current visas of Wang Zhaojie and Yan Yunlong for
 10 travel to Macau require that both witnesses return to mainland China no later than August 30,
 11 2022;

12 WHEREAS, Irico represents that there was not sufficient time for Irico to apply for and
 13 receive new visas for the Witnesses to travel to Macau in time to ensure that the depositions could
 14 go forward after August 30, 2022, but prior to the September 9 Deadline;

15 WHEREAS, in order to comply Court’s order of August 11, 2022, and in light of the
 16 expiration of the current visas, on August 19, Irico informed DPPs and IPPs that it was prepared to
 17 proceed with the depositions of the Witnesses between August 23 and August 30, 2022; and,

18 WHEREAS, the Parties agree that conducting the depositions on the schedule proposed by
 19 Irico would create significant difficulty for all Parties, and that a short extension of the deposition
 20 deadline to allow time for the Witnesses to obtain new visas would benefit all Parties and allow for
 21 the orderly conduct of the depositions;

22 IT IS HEREBY STIPULATED AND AGREED by and between counsel for DPPs, IPPs,
 23 and the Irico Defendants that good cause exists to modify the deadline for the Witnesses to appear
 24 as follows:

25 1. The September 9, 2022, deadline for Irico witnesses to appear for deposition is
 26 hereby VACATED;

27 2. Irico will arrange for the Witnesses to apply for visas by August 26, 2022, to
 28 facilitate depositions for both witnesses in the time frames indicated below;

1 3. Irico will provide Plaintiffs with copies of the visa renewal applications, and any
2 related non-intra-governmental communications with the Macau visa authority, and will keep
3 Plaintiffs informed regarding the status of the applications;

4 4. Provided that his new visa is received by September 15, 2022, the deposition of
5 Wang Zhaojie shall be conducted remotely from Macau during the week of September 19, 2022;

6 5. Provided that his new visa is received by September 15, 2022, the deposition of Yan
7 Yunlong shall be conducted remotely from Macau during the week of September 26, 2022;

8 6. If the Witnesses do not receive their new visas by September 15, 2022, or if the
9 Witnesses are involuntarily quarantined on their travel to Macau for the depositions such that they
10 are not able appear on the scheduled dates, the Parties may file a new Stipulation and [Proposed]
11 Order to allow for a limited amount of additional time for the deposition(s) to proceed once the
12 visas are obtained or quarantine conditions permit the deposition(s) to proceed;

13 7. This Stipulation and Order does not modify any other dates or terms of this Court's
14 August 11, 2022 Order except as stated above.

15 **PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO**
16 **ORDERED.**

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18 Dated: August 22, 2022


HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

1 Dated: August 22, 2022

2 /s/ R. Alexander Saveri

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